

## **EXHIBIT 20**

James Justin Lyles  
Provence, Tiffany N v. United States of America, et al

December 14, 2021

Page 1

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION  
IN ADMIRALTY

TIFFANY N. PROVENCE, AS THE PERSONAL  
REPRESENTATIVE OF THE ESTATE OF JUAN  
ANTONIO VILLALOBOS HERNANDEZ,

Plaintiff,

vs. CASE NO. 2:21-cv-965-RMG

UNITED STATES OF AMERICA, CROWLEY  
MARITIME CORPORATION, CROWLEY GOVERNMENT  
SERVICES, INC., DETYENS SHIPYARDS, INC.,  
AND HIGHTRAK STAFFING, INC. D/B/A HITRAK  
STAFFING, INC.,

## Defendants.

DEPOSITION OF: JAMES JUSTIN LYLES  
DATE: December 14, 2021  
TIME: 9:08 a.m.  
LOCATION: DETYENS SHIPYARDS, INC.  
1670 Dry Dock Avenue  
Suite 200  
North Charleston, SC

TAKEN BY: Counsel for the Plaintiff

REPORTED BY: MICHAEL DAVID ROBERTS,  
Court Reporter

James Justin Lyles  
Provence, Tiffany N v. United States of America, et al

December 14, 2021

Page 39

1 it was a couple years ago.

2 Q. Right. Do you remember you actually  
3 met with the chief mate even if you don't recall  
4 the details of it?

5 A. Yes, sir.

6 Q. So on the Lummus when you would do your  
7 safety walks, you would meet with the chief mate?

8 A. Get with somebody from the ship's crew  
9 to see if they have any issues. That's the first  
10 thing you do when you get on board.

11 Q. Okay. Every time you get on board, the  
12 first thing you do is communicate with somebody  
13 from the ship's crew. Is that accurate?

14 A. If -- if they're available.

15 MR. CLEMENT: Objection to the form.

16 You can answer.

17 THE WITNESS: If they're available.

18 BY MR. YOUNG:

19 Q. Okay. Right. All right. So assuming  
20 that they're available, every time you step on a  
21 ship, the first thing you do is communicate  
22 directly with some of the ship's crew; is that  
23 right?

24 A. Yes, sir.

25 Q. And the purpose of that is to find out